UNITED STATES DISTRICT COURT WESTER DISTRICT OF TEXAS AUSTIN DIVISION

| UNITED STATES OF AMERICA | § | |
|----------------------------|---|------------------|
| | § | |
| v. | § | 1:22-CR-00053-LY |
| | § | |
| FRANKLIN BARRETT SECHRIEST | § | |

AGREED MOTION FOR CONTINUANCE

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now FRANKLIN BARRETT SECHRIEST, defendant herein, by and through his attorney of record in the above styled and numbered cause, and files this Agreed Motion for Continuance, and in support would show the Court as follows:

Mr. Sechriest was indicted for Damage to Religious Property, Arson and an explosive device used in the commission of a felony. This case is set for pretrial on Tuesday, January 31, 2023, and for trial on February 13, 2023. The parties have been diligently negotiating a proposed plea settlement. This case has several factors that complicate the negotiation process. Additional time is required for the parties to attempt an agreed resolution.

Counsel has been in contacted with Mr. Matt Devlin, the Assistant United States

Attorney in charge of the case, who agrees with this request for additional time. Counsel requests
an additional 30 days to attempt a resolution.

Matt Devlin, the Assistant United States Attorney in charge of the government case, agrees this request.

WHEREFORE PREMISES CONSIDERED, Counsel for Mr. Sechriest prays that this Honorable Court grant this motion for continuance for 30 days.

| | Respectfully submitted, |
|---|---|
| | /S/ |
| | Daniel H. Wannamaker |
| | Counsel for Sechriest 13809 Research Blvd., suite 500 |
| | Austin, Texas 78701 |
| | TX Bar No. 20834300 |
| | 512.236.9929 office 512.233.5979 fax |
| | dhw@wannamakerlaw.com |
| | |
| <u>CERTIFICATE OI</u> | FSERVICE |
| I, Daniel H. Wannamaker, hereby certify that | at on January 23, 2023, I electronically filed |
| the foregoing motion with the clerk for the U.S. Dis | strict Court, Western District of Texas, using |
| the electronic filing system for the court. The elec | ctronic case filing system sent a "Notice of |
| Electronic Filing to AUSA Matt Devlin. | |
| | /S/ |
| | Daniel H. Wannamaker |
| | |
| <u>CERTIFICATE OF C</u> | ONFERENCE |
| I, Daniel H Wannamaker, attorney for the de | efendant, do hereby certify that Matt Devlin, |
| the United States Attorney assigned to this matter ag | rees with this request for a continuance. |
| | <u>/s/</u> |
| | Daniel H. Wannamaker |

UNITED STATES DISTRICT COURT WESTER DISTRICT OF TEXAS AUSTIN DIVISION

| v. | § § § 1:22-CR-00053-LY § § | | |
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| ORDER | | | |
| ON THIS the day of | , 2022, the Agreed Motion for | | |
| Continuance, and said motion is hereby | | | |
| GRANTED/DENIED. | | | |
| SIGNED January, 2022. | | | |
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| | LEE YEAKEL UNITED STATES DISTRICT JUDGE | | |